

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

THE MIDDLE EAST FORUM, :
Plaintiff, :
v. :
LISA REYNOLDS-BARBOUNIS, : Civil Action No.: 19-5697
Defendant. :
:

**PLAINTIFF MIDDLE EAST FORUM'S MOTION FOR
LEAVE TO FILE OVERLENGTH MEMORANDUM OF LAW**

Plaintiff The Middle East Forum (“Plaintiff” or “MEF”), by counsel, files this Motion for Leave to File an Overlength Memorandum of Law in Support of its Motion for New Trial. *See* The Honorable Juan R. Sánchez, *Policies and Procedures* § II.E.5 (requiring leave to file a memorandum of law exceeding 15 pages). In support of its Motion, Plaintiff states the following:

1. On December 16, 2021, a civil jury returned a verdict following a four-day trial in this matter. *See* Verdict, ECF No. 184.
2. Plaintiff intends to file a Motion for a New Trial tomorrow, January 13, 2022. Due to the complex nature of this case, Plaintiff’s motion for new trial raises several issues. The trial in this matter concerned nine different claims for relief. It lasted four days and consisted of live testimony from several witnesses, hundreds of documents, and dozens of evidentiary rulings.
3. Additional pages are necessary to ensure that Plaintiff can thoroughly and fairly present its arguments in favor of a new trial. These arguments require legal analysis, excerpts of relevant trial testimony, as well as citations to the record and legal authorities. Additionally,

requiring Plaintiff to truncate its arguments would prejudice Plaintiff's ability to advance and preserve its objections and arguments.

4. This Court has previously granted a defendant leave to file an overlength memorandum of law in support of a motion for new trial. *See Order, Mente Chevrolet Oldsmobile Inc. v. GMAC*, No. 08-cv-2403 (E.D. Pa. Dec. 29, 2009) (Sánchez, J.), ECF No. 182 (permitting party to file a 23-page motion for new trial). The circumstances that warranted leave in *Mente Chevrolet* exist here; namely, both cases involve lengthy jury trials that require the defendant to address several complex issues of law and fact in their motion for new trial.

5. During the pendency of this case, Plaintiff has only requested leave to file an overlength brief one time (for a memorandum in support of a preliminary injunction motion), and this request was granted. *See Order* (Dec. 5, 2019), ECF No. 8.

6. Specifically, Plaintiff requests leave to file a memorandum of 23 pages.

7. Plaintiff will consent to a similar page-limit extension for any opposition filed by Defendant.

CONCLUSION

For these reasons, Plaintiff respectfully requests that this Court enter an Order granting Plaintiff leave to file an overlength memorandum of law in support of its motion for new trial and granting such other relief as this Court deems proper.

Dated: January 13, 2022

THE MIDDLE EAST FORUM
By counsel

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CERTIFICATE OF SERVICE

I hereby certify that, on January 13, 2022, a true and correct copy of the foregoing was filed and served on all parties of record by ecf/electronic mail.

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